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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

NAACP OF SAN JOSÉ/ SILICON VALLEY; ET AL.,

 Plaintiffs,

 v.

 CITY OF SAN JOSÉ; ET AL.,

 Defendants.

Case No. 4:21-cv-01705 PJH

**STIPULATION AND
 [PROPOSED] ORDER
 MODIFYING CASE SCHEDULE**

WHEREAS, this case is a putative class action with fourteen named plaintiffs, arising from the San Jose Police response to three days of demonstrations involving thousands of people

and hundreds of police officers, and presents unique challenges in identifying Doe defendant officers who used force on the plaintiffs, particularly in that officers expended hundreds of “less lethal” munitions during the demonstrations, but for the most part did not or could not make arrests, and it has been difficult locating some of the incidents at issue or identifying the officers on video;

WHEREAS, Defendants have produced thousands of documents and thousands of hours of police body worn camera and other videos and audio files;

WHEREAS, despite diligent efforts Plaintiffs have not completed review of all of the videos and other discovery produced to date;

WHEREAS, despite diligent efforts neither side has yet been able to identify the Doe officers responsible for using force on most of the plaintiffs;

WHEREAS, the parties have identified a number of officers as having used force or supervised the use of force in the vicinity of certain Plaintiffs, and Plaintiffs have just begun deposing those officers due to the need to first review discovery;

WHEREAS, depositions are being scheduled through September in an effort to identify the Doe officers;

WHEREAS, this is the first request the parties have made to modify the deadlines ordered in this case; and

WHEREAS, the proposed modification below to the deadline to amend pleadings will not affect any of the other deadlines in the Case Management Order from October 22, 2021 (Dkt. 51).

THEREFORE, the parties stipulate to amend the pretrial schedule (Dkt. 51), to extend the deadline for Plaintiffs to amend the pleadings and name Doe defendants, currently July 15, 2022,

/

to September 30, 2022.

It is so stipulated.

Dated: July 14, 2022 By: /S/ Rachel Lederman
ALEXIS C. BEACH & RACHEL LEDERMAN, Attorneys
Attorneys for Plaintiffs NAACP, et al.

Dated: July 14, 2022 NORA FRIMANN, City Attorney
By: /s/ Yue-Han Chow
YUE-HAN CHOW
Sr. Deputy City Attorney
Attorneys for Defendants

ATTESTATION PER L.R. 5-1

I, Rachel Lederman, hereby attest, pursuant to Local Rule 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

/S/ Rachel Lederman

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NAACP OF SAN JOSÉ/ SILICON VALLEY; ET AL.,

Plaintiffs,

v.

CITY OF SAN JOSÉ; ET AL.,

Defendants.

Case No. 4:21-cv-01705 PJH

**[PROPOSED] ORDER
MODIFYING CASE SCHEDULE**

Pursuant to the stipulation of the parties, and good cause appearing therefor, the case schedule (Dkt 51) is modified to extend the deadline for Plaintiffs to amend the pleadings and name Doe defendants to September 30, 2022.

IT IS SO ORDERED.

Dated: _____

United States District Judge